

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No. _____
v.	:	Date Filed: _____
ROGEL GRANT,	:	VIOLATIONS:
a/k/a "Bradley,"	:	21 U.S.C. §841(a)(1) (distribution of
	:	in excess of 5 grams cocaine base
	:	("crack") - 3 counts)
	:	21 U.S.C. §841(a)(1) (distribution of
	:	in excess of 50 grams cocaine base
	:	("crack") - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute in excess of 5 grams of
	:	cocaine base ("crack") - 1 count)
	:	Notice of additional factors
	:	Notice of prior convictions

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 28, 2004, at Reading, in the Eastern District of
Pennsylvania, defendant

ROGEL GRANT,
a/k/a "Bradley,"

knowingly and intentionally distributed more than 5 grams, that is approximately 6.0 grams, of a
mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II
controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 12, 2004, at Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally distributed more than 5 grams, that is approximately 5.2 grams, of a
mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II
controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 14, 2004, at Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally distributed more than 5 grams, that is approximately 28.3 grams, of
a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II
controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2004, at Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally distributed more than 50 grams, that is approximately 86.4 grams, of
a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II
controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2004, at Reading, in the Eastern District of Pennsylvania,
defendant

**ROGEL GRANT,
a/k/a “Bradley,”**

knowingly and intentionally possessed with intent to distribute more than 5 grams, that is
approximately 27.8 grams, of a mixture or substance containing a detectable amount of cocaine
base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Counts One through Five of this indictment, defendant **ROGEL GRANT, a/k/a “Bradley”**:

a. Committed the instant offense while under a criminal justice sentence, that is, parole, as defined by U.S.S.G. § 4A1.1(d).

b. Was a career offender, as defined by U.S.S.G. § 4B1.1.

NOTICE OF PRIOR CONVICTIONS

THE GRAND JURY FURTHER CHARGES THAT:

Defendant **ROGEL GRANT, a/k/a “Bradley,”** committed the offenses charged in Counts One through Five of this indictment after having been convicted in a court of the Commonwealth of Pennsylvania of felony drug offenses, as follows:

Delivery of a controlled substance, indictment no. 6450/01 (Berks County Court of Common Pleas, July 30, 2002); and

Delivery of a controlled substance, indictment no. 2862/02 (Berks County Court of Common Pleas, July 30, 2002).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY